

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF HOME)	
ENERGY ASSISTANCE PROGRAMS OFFERED)	CASE NO.
BY INVESTOR-OWNED UTILITIES PURSUANT TO)	2019-00366
KRS 278.285(4))	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO LOUISVILLE GAS AND ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY

Louisville Gas and Electric Company (LG&E) and Kentucky Utilities (KU) (jointly, LG&E/KU), pursuant to 807 KAR 5:001, are to file with the Commission the original and an electronic version of the following information. The information requested herein is due on February 14, 2020. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

LG&E/KU shall make timely amendment to any prior response if they obtain information which indicates that the response was incorrect when made or, though correct

when made, is now incorrect in any material respect. For any request to which LG&E/KU fail or refuse to furnish all or part of the requested information, they shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, LG&E/KU shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Community Action of Kentucky, Inc.'s (CAK) Response to Staff's First Request for Information, Attachment A, which contains CAK's recommendations for revisions to HEA programs. If the Commission were to implement each recommendation, explain how implementing the recommendation would impact your utility, addressing in detail any perceived benefits, adverse consequences, or impediments to implementing the recommendations.

2. Identify any other bill payment assistance programs, other than those listed on the attached spreadsheet, that your utility funds either through customer donations or shareholder funds. Describe all funding sources for the program(s); state whether the program is a crisis program or recurring benefit program; provide the eligibility criteria; and state whether any fees are paid to administer the program(s).

3. Explain whether HEA benefits are prioritized or provided before or after other available benefits, such as LIHEAP, donations, or other programs aimed at reducing consumers' energy burdens.

4. Refer to Attachment 1 to Staff's Second Request for Information, Item 4, page 5 of 5. Provide the number of residential customers served by LG&E in each of the zip codes provided. Further, to the extent available, provide the average monthly bill for residential customers in those zip codes and the average residential monthly bill system-wide.

5. Refer to Attachment 2 to Staff's Second Request for Information, Item 4. Provide the number of residential customers served by LG&E in each of the counties provided. Further, to the extent available, provide the average monthly bill for residential customers in those counties and the average residential monthly bill system-wide.

6. Refer to Attachment 2 to Staff's Second Request for Information, Item 5. Provide the number of residential customers served by KU in each of the counties provided. Further, provide the 2018 annual distribution to each county listed. Finally, to the extent available, provide the average monthly bill for residential customers in those counties and the average residential monthly bill system-wide.

7. Refer to the agreements provided as Attachments to Staff's Second Request for Information, Item 6. Further, reference is made to the section "Regulatory Approval" in each agreement. Provide the case number and the date of the Order in which the Commission approved the agreements or the programmatic details arising from the agreements.

8. Refer to LG&E/KU's response to Staff's Second Request for Information, item 7.

a. Explain why "Section 8 and subsidized housing will not be a barrier to enrollment beginning in 2020," and why it is a barrier now.

b. State where the requirements to participate in the HEA program, such as attendance at an initial orientation or not have a past due bill over \$1,000, are located.

c. Explain whether the HEA program KU administers has the same requirements.

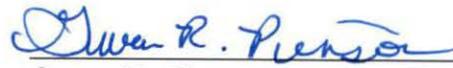
9. Refer to the Attachment to LG&E/KU's response to Staff's Second Request for Information, Item 8. For each HEA program, explain how the program was derived and provide the basis for the monthly benefit.

10. For each HEA program, provide the following information for each of the last five full program years:

a. The average monthly bill for all residential customers for each month from November to March.

b. The average monthly bill for residential customers receiving HEA benefits for each month from November to March.

c. The average monthly bill for residential customers receiving LIHEAP benefits for each month from November to March.



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DATED JAN 31 2020

cc: Parties of Record

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